

Horan, Alanna R. (CIV)

From: J Edward Bell <jeb@belllegalgroup.com>
Sent: Sunday, February 9, 2025 8:34 AM
To: Horan, Alanna R. (CIV); Laura Baughman - Weitz & Luxenberg
Cc: Dawn Bell; Zina Bash; Lipscomb, Bridget (CIV); Bain, Adam (CIV); Leinicke, John S (CIV); Cromwell, Michael W. (CIV); Anwar, Haroon (CIV); Robin Greenwald; Ryan, Patrick J. (CIV); Kevin Dean; Bu, Nathan J. (CIV)
Subject: [EXTERNAL] Re: CLJA | Friday Deposition Meet and Confer - Deposition Requests - 1/10/2025

Alanna

Thank you for this note. We will agree with your request but with the strict limitation to the subject matter and while the outer limits for the deposition would be 90 minutes, DOJ will attempt to complete the deposition in 60 mins.

Please confirm this and we will work on dates.

Thanks
Ed BELL



BELL
LEGAL
GROUP

CHARLESTON
SCHOOL OF LAW

Ed Bell

Founding Partner

President | Charleston School of Law

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Georgetown, SC 29440

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R GLOBAL MEMBER FIRM

From: Horan, Alanna R. (CIV) <Alanna.R.Horan@usdoj.gov>

Date: Friday, February 7, 2025 at 6:09 PM

To: Laura Baughman - Weitz & Luxenberg <lbaughman@weitzlux.com>

Cc: J Edward Bell <jeb@belllegalgroup.com>, Dawn Bell <DBell@belllegalgroup.com>, Zina Bash <zina.bash@kellerpostman.com>, Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>, Bain, Adam (CIV) <Adam.Bain@usdoj.gov>, Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>, Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>, Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>, Robin Greenwald <rgreenwald@weitzlux.com>, Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>, Kevin Dean <KDean@motleyrice.com>, Bu, Nathan J. (CIV) <Nathan.J.Bu@usdoj.gov>

Subject: RE: CLJA | Friday Deposition Meet and Confer - Deposition Requests - 1/10/2025

Laura,

Following up on the meet and confer, we want to put our position on Mr. Hunt's and Mr. Cagiano's depositions in writing to exhaust any chance of resolution before we raise this with the Court.

Plaintiffs' expert Dr. Sabatini relies on affidavits from Mr. Hunt and Mr. Cagiano provided to us for the first time with his expert report. In response to the United States contention interrogatories seeking individuals with knowledge of the allegations relating to water buffaloes, the PLG did not identify any plaintiffs. See Response to ROG 6 ("Numerous Camp Lejeune historical veterans and servicemembers would have personal knowledge and recollection with regard to the use of water buffaloes, including the facts stated above."); (Including without identifying Mr. Cagiano or Mr. Hunt that "[m]oreover, there are several written statements or affidavits from persons with personal knowledge stating that water buffaloes filled at Camp Lejeune were used to support field activities off-base, including at Bogue Field."). In preparing their affidavits, both Mr. Hunt and Mr. Cagiano profess to have viewed documents without identifying the documents they viewed. Finally, the deposition testimony relating to water buffaloes is inconsistent with the testimony found in the affidavit. For example, Mr. Cagiano was asked, "[s]o you would be present when the water buffalo was being filled?" to which he replied, "[n]ot usually, no." 2/8/24 M.Cagiano Dep. Tr. 42:13-15. He further stated he could not describe the general process for filling the water buffalo without "probably skipping some steps." *Id.* at 43:16-21. However, his affidavit states, "[d]uring my time as Battery Motor Transport Officer, I had the opportunity on many occasions to witness the filling of water buffaloes." Cagiano Aff. at p.5; *compare* "[W]e -- as I remember, we had a couple of points where it -- to be filled." M.Cagiano Dep. Tr. at 43:22-44:3 *with* "Of the water buffalo filling events I witnessed, all of them had involved filling M149A1 through the manhole cover located at the top of the tank." Cagiano Aff. at p.7. The exact topic for which Mr. Cagiano declined knowledge is now the subject of his affidavit.

We are willing to accommodate the plaintiffs to balance the personal burden of a deposition with the needs of this litigation. As Haroon stated on the call, we are willing to conduct Mr. Cagiano's and Mr. Hunt's depositions on zoom and limit the time to 90 minutes. To the extent there are additional accommodations that Mr. Cagiano and Mr. Hunt need, we remain willing to consider any requests.

As to Mr. Downs' deposition, we are continuing to discuss internally our position.

Best,
Alanna

From: Baughman, Laura <lbaughman@weitzlux.com>

Sent: Wednesday, February 5, 2025 3:27 PM

To: Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>; Kevin R. Dean <kdean@motleyrice.com>

Cc: Ed Bell <jeb@belllegalgroup.com>; Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Linicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>; Kevin R. Dean <kdean@motleyrice.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Linicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>

Subject: [EXTERNAL] RE: CLJA | Friday Deposition Meet and Confer - Deposition Requests - 1/10/2025

Patrick:

We are not inclined to agree to produce Mark Cagiano and Ernest David Hunt for another deposition. As you know, these plaintiffs already sat for deposition and were questioned about water buffaloes. The United States had the opportunity at that time to ask any and all questions it had about water buffaloes. Fact discovery is closed, and we are now in expert discovery. In addition, Mr. Cagiano has a surgery scheduled this month which will require multiple preop appointments and at least a two week recovery period. We are available to meet and confer about this issue if that would be helpful.

Laura

Laura Baughman, Esq. | Weitz & Luxenberg, PC
700 Broadway | New York, NY 10003
Cell: 214-850-6790 | lbaughman@weitzlux.com

From: Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>

Sent: Friday, January 31, 2025 6:06 PM

To: Baughman, Laura <lbaughman@weitzlux.com>; Kevin R. Dean <kdean@motleyrice.com>

Cc: Ed Bell <jeb@belllegalgroup.com>; Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Linicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>; Kevin R. Dean <kdean@motleyrice.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Linicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>

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Counsel,

It was a pleasure speaking with you at today's deposition meet and confer. To confirm a question asked by Laura today, Allison O'Leary and Alanna Horan from the DOJ will attending the deposition of Mustafa Aral.

For everyone's awareness, below is a summary of the deposition dates discussed in today's call. If there's anything I didn't catch please feel free to let me know.

Government Requested Depositions

- The United States requested to take depositions of Plaintiffs, **Mark Cagiano** (7:23-cv-00569) and **Ernest David Hunt** (7:23-cv-00452). We intend to depose them on the contents of their affidavits included in Plaintiffs phase 1 expert reports. Kevin Dean from PLG stated he would work on providing available dates before March 11 for in person depositions.

Historian Depositions

- **Dr. Longly:** DOJ and PLG agreed to a deposition on April 3 in Orange, California. PLG will confirm a specific location.
- **Dr. Brigham:** DOJ and PLG agreed to a deposition on March 25 at DOJ's office in DC.

Best,



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 U.S. Department of Justice
 Washington, DC
 202-307-5842 (Office)
 202-880-0198 (Mobile)
Patrick.J.Ryan@usdoj.gov

From: Baughman, Laura <lbaughman@weitzlux.com>

Sent: Friday, January 24, 2025 1:26 PM

To: Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>

Cc: Kevin R. Dean <kdean@motleyrice.com>; Ed Bell <jeb@belllegalgroup.com>; Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>; Kevin R. Dean <kdean@motleyrice.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>

Subject: [EXTERNAL] Re: CLJA | Friday Deposition Meet and Confer - Deposition Requests - 1/10/2025

Patrick:

Please notice the deposition of Dr. Sabatini at this address:

3141 Hood Street, #600, Dallas, TX, 75219.

This is the office of the Ben Martin Law Group, which has graciously agreed to allow us to use one of their conference rooms for the deposition. We will also have breakout rooms.

Thank you,

Laura

call

On Jan 23, 2025, at 10:12 PM, Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov> wrote:

CAUTION: THIS EMAIL IS FROM AN EXTERNAL SOURCE. It may contain viruses. Do not click on a link, open or enable any file unless you trust the sender.

Hi Kevin,

I am sorry to hear of a passing in your family. We can propose alternative dates of Tuesday, March 18 for Dr. Alex Spiliotopoulos' deposition, and Thursday, March 20 for Dr. Remy Hennet's deposition.

Please let us know if these dates would work on PLG's end.

Best,

<image001.jpg> Patrick J. Ryan
Environmental Torts Litigation
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Washington, DC
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202-880-0198 (Mobile)
Patrick.J.Ryan@usdoj.gov

From: Dean, Kevin R. <kdean@motleyrice.com>
Sent: Thursday, January 23, 2025 10:45 AM
To: Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>; Baughman, Laura <lbaughman@weitzlux.com>
Cc: Ed Bell <jeb@belllegalgroup.com>; Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>
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Patrick, the reason as you request is that Because I have been dealing with several emergencies, storm and the death of my brother-in-law this week, and was not on these calls, paying close attention to emails and the taking attorney. Please consider and provide an alternative tues-thurs which I will commit to make work so as not to cause a family commitment on the 14th to cause me not to participate and enter the dog house.

Thank you

Kevin Dean
Attorney at Law

28 Bridgeside Blvd., Mt. Pleasant, SC 29464
o. 843.216.9152 c. 843.834.1130 f. 843.216.9267
kdean@motleyrice.com

From: Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>
Sent: Thursday, January 23, 2025 10:37 AM

To: Dean, Kevin R. <kdean@motleyrice.com>; Baughman, Laura <lbaughman@weitzlux.com>
Cc: Ed Bell <jeb@belllegalgroup.com>; Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>
Subject: RE: CLJA | Friday Deposition Meet and Confer - Deposition Requests - 1/10/2025

CAUTION:EXTERNAL

Hi Kevin,

Laura's email below dated Friday, January 10 confirmed PLG's intent to take Dr. Hennet's deposition on March 14. Further, on Wednesday, January 22, Laura reaffirmed this, stating "we remain available to take Dr. Hennet's deposition on March 14," and her email this week made no mention of a conflict. Are you now representing that PLG has a conflict with this previously confirmed March 14 date for Dr. Hennet's deposition? We would appreciate clarification on this.

Best,

<image001.jpg> Patrick J. Ryan
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Washington, DC
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202-880-0198 (Mobile)
Patrick.J.Ryan@usdoj.gov

From: Dean, Kevin R. <kdean@motleyrice.com>
Sent: Wednesday, January 22, 2025 9:53 PM
To: Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>; Baughman, Laura <lbaughman@weitzlux.com>
Cc: Ed Bell <jeb@belllegalgroup.com>; Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>
Subject: [EXTERNAL] Re: CLJA | Friday Deposition Meet and Confer - Deposition Requests - 1/10/2025

we have a conflict on fri march 14, another date for dr hennet earlier that week or thr next?

Kevin Dean
Attorney at Law

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From: Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>
Sent: Wednesday, January 22, 2025 5:04:01 PM

To: Baughman, Laura <lbaughman@weitzlux.com>

Cc: Ed Bell <jeb@belllegalgroup.com>; Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>; Dean, Kevin R. <kdean@motleyrice.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>

Subject: RE: CLJA | Friday Deposition Meet and Confer - Deposition Requests - 1/10/2025

CAUTION:EXTERNAL

Hi Laura,

In this case we can agree to Dr. Sabatini's deposition on March 11, Dr. Hennessey's deposition on March 14, and Dr. Spiliotopoulos on either Wednesday, March 19 or Thursday, March 20.

Please let us know if this works on your end, and if you have a preference for either date offered for Dr. Spiliotopoulos. As always, we appreciate your assistance.

Best,

<image001.jpg>

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From: Baughman, Laura <lbaughman@weitzlux.com>

Sent: Wednesday, January 22, 2025 12:28 PM

To: Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>

Cc: Ed Bell <jeb@belllegalgroup.com>; Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>; kdean@motleyrice.com; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>

Subject: [EXTERNAL] Re: CLJA | Friday Deposition Meet and Confer - Deposition Requests - 1/10/2025

Patrick:

Regarding Dr. Sabatini, as I explained on our last call, he is not available the weeks beginning February 17 and 24 due to his prior travel commitments. We have offered six dates for his deposition within the schedule the court allowed, and you have rejected each of them. Of the dates you have offered, the only one that works for him is March 11, and that will require him to make significant rearrangements of his

schedule. We are willing to do this, provided that you offer dates for your two experts that are after March 11.

Please offer dates for your two experts after March 11. We remain available to take Dr. Hennet's deposition on March 14, or we can take Dr. Spiliotopoulos on that date. We are available the week of March 17. At least one of your experts will need to be taken that week, because we do not agree to take these depositions back to back. It is my understanding that if the parties agree to take a deposition after the deadline, this does not require court approval and has been done multiple times before.

Please let us know this week whether this works. Dr. Sabatini needs to rearrange his schedule, and he needs notice to do that.

Thank you,
Laura

On Jan 21, 2025, at 6:36 PM, Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov> wrote:

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Hi Laura,

For Dr. Sabatini, we'd propose February 27, 28 or March 10, 11. Unfortunately Feb. 1, 2, 3 and 4 do not work for this deposition. We agree to keep Jones and Davis scheduled on February 13 and 14.

Additionally, would Friday, March 7 work on your end for the deposition of Alex Spiliotopoulos?

As always, I appreciate your assistance with scheduling.

Best,
Patrick

From: Baughman, Laura <lbaughman@weitzlux.com>

Sent: Monday, January 20, 2025 10:04 AM

To: Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>; Ed Bell <jeb@belllegalgroup.com>

Cc: Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>;

Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV)

<Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>;

Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV)

<Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>;

kdean@motleyrice.com; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain,

Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV)

<John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV)

<Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>;

Greenwald, Robin <RGreenwald@weitzlux.com>

Subject: [EXTERNAL] Re: CLJA | Friday Deposition Meet and Confer - Deposition Requests - 1/10/2025

Hi, Patrick:

I am following up on our conversation from Friday. You stated that Feb. 10 and 11 do not work on your end for the deposition of Dr. Sabatini. We discussed potentially moving the depositions of Dr. Jones and Mr. Davis, but I am writing to let you know that those depositions need to remain as is, as previously agreed, on Feb. 13 and 14.

Regarding Dr. Sabatini, we can also offer Feb. 1, 2, 3 and 4 for his deposition. Because these dates are rapidly approaching and we need to make travel plans, please let me know ASAP which date works on your end.

Thank you,
Laura

On Jan 15, 2025, at 5:03 AM, Baughman, Laura
<lbaughman@weitzlux.com> wrote:

Patrick:

PLG offers the following dates for rebuttal experts for whom deposition dates have not already been agreed to:

PLG Experts

1. **Dr. David Sabatini:** Feb. 10 or 11 in Dallas, Texas
2. **Dr. Leonard Konikow:** Feb. 25 or 26 in Reston, VA

PLG also served rebuttal reports from Mr. Maslia, Dr. Jones and Mr. Davis, but deposition dates for those experts have already been agreed upon.

Please let us know which of the above dates work on your end. Also, just a reminder to please provide dates for the deposition of Dr. Brigham, and to let us know if March 11 works for the deposition of Dr. Spiliotopoulos.

Thank you,
Laura

Laura J. Baughman, Esq.
Weitz & Luxenberg, P.C.
700 Broadway
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Phone: 212-558-5915
Fax: 646-293-7479
lbaughman@weitzlux.com

From: Baughman, Laura
Sent: Friday, January 10, 2025 3:31 PM
To: Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>; Ed Bell <jeb@belllegalgroup.com>
Cc: Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>; kdean@motleyrice.com
Subject: RE: CLJA | Friday Deposition Meet and Confer - Deposition Requests - 1/10/2025

Patrick:

Thank you for your email. I can confirm the following:

PLG Experts

3. **Mustafa Aral:** This is confirmed for February 6 for an in-person deposition at Weitz & Luxenberg's NYC office.
4. **Morris Maslia:** This is confirmed for February 20 for an in-person deposition at Bell Legal Group's office in Georgetown, SC.
5. **Norman Jones, and Jeffrey Davis:** Dr. Jones and Mr. Davis are available Feb. 13 and 14 for in-person depositions in Salt Lake City. We recommend reserving a conference room at Grand America, Marriott or Hilton in downtown Salt Lake City.

Government Experts

6. **Alex Spiliotopoulos:** We would like to take this deposition on March 11 at your DOJ office in Washington, DC. Please let us know if this works on your end.
7. **Remy Hennet:** We confirm that we will take Dr. Hennet's deposition on March 14 at your DOJ office in Washington, DC.
8. **Jay Brigham:** Please provide available dates for the deposition of Jay Brigham.

Laura

Laura J. Baughman, Esq.
Weitz & Luxenberg, P.C.
700 Broadway

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Phone: 212-558-5915
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lbaughman@weitzlux.com

From: Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>
Sent: Friday, January 10, 2025 2:25 PM
To: Baughman, Laura <lbaughman@weitzlux.com>; Ed Bell <jeb@belllegalgroup.com>
Cc: Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>; kdean@motleyrice.com
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Ed and Laura,

It was a pleasure speaking with you this afternoon. Below are the dates and locations discussed in today's deposition meet and confer for the parties' expert deposition requests.

PLG Experts

9. **Mustafa Aral:** The Government confirms availability on February 6 for an in-person deposition of Mr. Aral at Weitz & Luxenberg's NYC office.
10. **Morris Maslia:** Unfortunately, the Government is unavailable on PLG's proposed dates of February 17 or 18. We propose alternative dates of February 20 or 21 for an in-person deposition of Mr. Maslia at Bell Legal Group's office in Georgetown, SC. Please let us know if these alternative dates work on your end.
11. **Norman Jones, and Jeffrey Davis:** Unfortunately, the Government is unavailable for PLG's proposed dates of January 30, 31. We propose alternative dates for both witnesses within the week of February 10 or the week of February 24. Please let us know if any of these alternative dates work on your end.

Government Experts

12. **Alex Spiliotopoulos** is available March 5 or 6 at our DOJ office in Washington, DC. Please let us know if this works on your end.
13. **Remy Hennet** is available March 12, 13, or 14 at our DOJ office in Washington, DC. Please let us know if this works on your end.

As always, we appreciate your assistance with coordinating these depositions. Please let us know of any questions.

Best,

<image001.jpg>

Patrick J. Ryan
Environmental Torts Litigation
U.S. Department of Justice
Washington, DC
202-307-5842 (Office)
202-880-0198 (Mobile)
Patrick.J.Ryan@usdoj.gov

From: Ryan, Patrick J. (CIV)
Sent: Friday, January 3, 2025 1:57 PM
To: Baughman, Laura <lbaughman@weitzlux.com>
Cc: Ed Bell <jeb@belllegalgroup.com>; Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>; kdean@motleyrice.com
Subject: RE: Expert Deposition Dates

Thank you, Laura.

I can be reached easiest through my cell if you need me: 202-880-0198.

Best,

<image001.jpg>

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Washington, DC
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From: Baughman, Laura <lbaughman@weitzlux.com>
Sent: Friday, January 3, 2025 1:28 PM
To: Ryan, Patrick J. (CIV) <Patrick.J.Ryan@usdoj.gov>
Cc: Ed Bell <jeb@belllegalgroup.com>; Dawn Bell <dbell@belllegalgroup.com>; zina.bash <zina.bash@kellerpostman.com>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Leinicke, John S (CIV) <John.S.Leinicke@usdoj.gov>; Cromwell, Michael W. (CIV) <Michael.W.Cromwell@usdoj.gov>; Anwar, Haroon (CIV) <Haroon.Anwar@usdoj.gov>; Greenwald, Robin <RGreenwald@weitzlux.com>; kdean@motleyrice.com
Subject: [EXTERNAL] Expert Deposition Dates

Patrick:

As a follow-up to our zoom today, below are the dates and locations for depositions of Plaintiffs' water modelling experts. Please let us know which dates work best for you, and whether you will take any of them remotely.

Jan. 29, 30 and 31 (two of the three dates) in Salt Lake City, Utah for Norm Jones and Jeff Davis;

Feb. 6 or 7 in NYC at the offices of Weitz & Luxenberg for Dr. Mustafa Aral; and

Feb. 17 or 18 in SC at Ed Bell's offices for Morris Maslia.

As I explained on the call, we are likely to have a few new experts on rebuttal, and we will provide dates and locations for their depositions with their reports, which will be served on January 14.

Please provide dates and locations for your water modelling experts, Dr. Alexandros Spiliotopoulos and Dr. Remy J.-C. Hennett, so that we can get those dates on our calendars.

You can reach me on my cell at 214-850-6790.

Laura

Laura J. Baughman, Esq.
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